

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**IN RE: SOCLEAN, INC., MARKETING,
SALES PRACTICES AND PRODUCTS
LIABILITY LITIGATION**

Master Docket No. 22-mc-152

MDL No. 3021

This Document Relates to: All Actions

MOTION TO APPOINT LEADERSHIP DEVELOPMENT COMMITTEE

COME NOW, co-lead counsel Ruth Anne French-Hodson and Gary E. Mason and file this *Motion to Appoint Leadership Development Committee* pursuant to the Court’s Pretrial Order #2, and would show unto this Honorable Court the following:

1. That on or about March 24, 2022, the Court entered *Pretrial Order #2*, which established the appointment of co-lead counsel, the Plaintiffs’ Steering Committee (“PSC”), and liaison counsel (collectively “plaintiffs’ leadership”).

2. That the Court delegated the creation of various committees and sub-committees to the sole discretion of co-lead counsel, which included a Leadership Development Committee, ordering co-lead counsel to “invest in the development of attorneys who have minimal MDL experience.”¹

¹ See Pretrial Order #2 at 9.

3. The Court envisioned that co-lead counsel and the PSC would impart to the Leadership Development Committee the “education, experience, and mentorship necessary to lead future MDLs,” allowing those attorneys to “meaningfully participate in all phases of this MDL.”

4. That co-lead counsel has selected certain individuals with limited MDL leadership experience, which it believes are well-suited to serve on the Leadership Development Committee, and by invitation of the court presents those individuals for appointment.²

5. Those individuals are as follows:

Sarah Bradshaw

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Since starting at Sharp Law in 2018, Sarah’s practice includes class and mass actions involving consumer protection, antitrust, civil RICO claims and mineral underpayment cases on behalf of royalty owners. And Sarah’s most notable cases include violations of Title IX, monetary recovery against immune and insolvent defendants, pleading novel interpretations of the Trafficking Victims Protection Reauthorization Act (TVPRA) and recovery for clients under state statutory Human Rights Acts. Sarah considers representation of these courageous sexual abuse survivors her greatest professional achievement.

Sarah is also very involved locally and in the Bar. Sarah has worn many hats on the Kansas City Metropolitan Bar Association YLS, and currently serves as Social Chair. She supports several charities around Kansas City, but most near and dear to her heart are the Midwest Innocence Project and Sheffield Place, a local shelter which empowers mothers and their children to heal from trauma by providing them tools for self-sufficiency.

Sarah has been named a *Super Lawyers* Kansas/Missouri Rising Star since 2019.

² See Transcript of Status Conference proceedings recorded on March 22, 2022 at page 32.

Ronald (“Rome”) V. Johnson, IV

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I am a graduate of Mississippi College School of Law located in Jackson, Mississippi and have been a member of the Mississippi bar since the fall of 2019. Upon graduating from law school and passing the bar, I joined my family law practice located in Hattiesburg, MS, the Deakle-Johnson Law Firm. Our firm, formally known as The Deakle Law Firm, focuses primarily on consumer class-action, personal injury and complex litigation, but has never had the opportunity to meaningfully participate in an MDL. Though I have limited MDL experience, I believe I could bring a valuable skillset to the Leadership Development Committee, including strong drafting skills, an eagerness to learn more about the MDL process and the ability to work well with other lawyers. I would sincerely appreciate the opportunity to gain valuable MDL experience through the mentorship of attorneys with a high degree of skill and knowledge regarding the management of an MDL. I would also be pleased to serve in any capacity which co-lead counsel or the Court deems useful or appropriate.

Richard J. Lajaunie

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I graduated from the University of Mississippi School of Law in 2000 and was admitted to practice to the State and Federal courts in Mississippi. Since beginning my practice, I have been involved extensively with mass torts regarding asbestos claimants (site review, product identification, client intake, claim processing and payment), as well as product defect cases and consumer bad faith cases against insurance companies. I have represented both plaintiffs and defendants in cases involving automobile accidents, breach of contract, the Mississippi Tort Claims Act, nursing home neglect, personal injury and premises liability. Due to my experience in mass torts and asbestos claims in particular, I am well-versed in database management. Additionally, I have filed motions to remand in cases related to an MDL proceeding successfully, both prior to, and after, the transfer of the case. I believe this to be a valuable opportunity to gain experience and knowledge in working a case that has been transferred and consolidated in a single court.

Sara Watkins

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After graduating from Duquesne University School of Law in May of 2018, Sara Watkins joined Robert Peirce & Associates, P.C. While there, Ms. Watkins has gained experience in class actions, mass torts, consumer protection, civil rights, nursing home abuse, and personal injury matters. Though Sara has diverse experience in litigation, primarily, she and her mentor, Aaron Rihn, manage their firm's class action and mass tort department. This experience, coupled with Sara's eagerness to continue to advocate for individuals injured by mass torts, make Ms. Watkins a strong candidate for the Leadership and Development Committee of MDL3021, In Re: SoClean, Inc.

In the four years since joining Robert Peirce & Associates, P.C., Sara Watkins has litigated numerous successful class actions, including: wage and hour violations (Allen v. Waste Pro, (Civil Action No.: 8:17-cv-02254-T-36CPT) (M.D.Fla.)); civil rights strip search cases (McDonald v. Franklin County, Ohio, (Civil Action No. 2:13-cv-00503-MHW-CMW) (S.D. Ohio)); consumer protection violations (Metague v. Woodbolt Distribution, LLD d/b/a Nutrabolt, (Civil Action No. 8:20-cv-02186-PX) (D. Md.)) and (Erby v. Allstate Insurance Co., (Civil Action No. 2:18-04944-PBT) (E.D. Pa.)).

In addition to the class actions, Sara currently represents thousands of Plaintiffs in the In Re: 3M (MDL 2885, 3:19-md-2885) (N.D.FL), In Re: Zantac (20-MD-2924) (S.D.FL), and In Re: Cook Medical, Inc. (MDL 2570, 1:14-ml-2570) (S.D.IN), In Re: Roundup (MDL 2741, 16-MD-2741) (N.D.CA), and In Re Philips Recalled CPAP, Bi-Level Pap, and Mechanical Ventilator Products Litigation (MDL 3014, 2:21-mc-01230) (W.D. Pa.).

Danielle Perry

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Danielle L. Perry is a partner at Mason LLP, and can offer nearly a decade of class action litigation experience to the benefit of the MDL and SoClean class. Graduating from the University of California, Berkeley in 2010 and from Loyola Law School, Los Angeles in 2013, Ms. Perry is licensed to practice in the State of California, District of Columbia, and in numerous federal district courts across the country as well as the U.S. Court of Federal Claims. While Ms. Perry originally focused her career on employment law class actions, after her first few years of practice she

expanded her experience and resume to cover numerous data breach and consumer class actions as well. Ms. Perry, either as an individual or as a member of her firm, has been named class counsel in numerous cases including: *Baksh v. Ivy Rehab Network, Inc.*, Case No. 7:20-cv-01845-CS (S.D.N.Y.) (data breach class action settlement; final approval granted Feb. 2021); *Richardson v. Overlake Hospital Medical Center et al.*, Case No. 20-2-07460-8 SEA (King County Superior Court, State of Washington (appointed class counsel in data breach class action involving approximately 109,000 individuals; final approval granted Sept. 2021); *Cece et al. v. St. Mary's Health Care System, Inc. et al.*, Civil Action No. SU20CV0500 (Superior Court of Athens-Clarke County, Georgia) (appointed class counsel in data breach case involving 55,652 people; final approval granted April 2022).

While this would be Ms. Perry's first official appointment to an MDL Committee, she has extensive experience providing support to appointed committees in MDL cases across the country. *See, e.g. In re DevaCurl Litigation*, Master File No. 1:20-cv-01234-GHW (S.D.N.Y.) (final approval granted January 3, 2022) (Mason LLP served as court-appointed Co-Lead Counsel and Ms. Perry undertook significant work in client vetting, drafting pleadings, and preparing settlement and settlement approval papers); *In re Hill's Pet Nutrition, Inc. Dog Food Prods. Liab. Litig.*, MDL No. 2887, No. 2:19-md-02887 (D. Kan.) (final approval granted Oct. 2021) (Mason LLP served as court-appointed Co-Lead Counsel and Ms. Perry played a significant roll in client vetting, discovery, and preparing settlement and settlement approval papers); *In re: Marriott International Customer Data Security Breach Litigation*, MDL No. 19-md-2879 (Dist. Md.) (Ms. Perry contributed to client vetting efforts); *In re U.S. Off. of Pers. Mgmt. Data Security Breach Litig.*, 266 F. Supp. 3d 1 (D.D.C. 2017) (Mason LLP serves as Liaison Counsel, and Ms. Perry has completed research assignments in support of and at the request of Lead Counsel).

Ms. Perry would be grateful for an official appointment to the Leadership Development Committee, and for the opportunity to both expand her MDL experience and bring her considerable class action experience to work for Co-Lead counsel and the SoClean class.

6. That co-lead counsel believes these individuals will benefit from meaningful inclusion in this MDL and that the co-leads shall incorporate the talents of each attorney into all phases of this MDL.

WHEREFORE, PREMISES CONSIDERED, Co-lead counsel respectfully moves this Honorable Court to grant the *Motion to Appoint Leadership Development Committee*, and, enter an Order appointing the aforementioned attorneys to the Leadership Development Committee so that each attorney may gain valuable experience and mentorship through inclusion in each phase of this MDL.

RESPECTFULLY SUBMITTED, this the _____ day of _____, 2022.

Co-Lead Counsel:

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